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May 4, 2021

By ECF

Hon. Sarah Netburn
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: SEC v. Ripple Labs, Inc. et al., No. 20-cv-10832 (AT) (SN) (S.D.N.Y.)

Dear Judge Netburn:

We write on behalf of Defendants Ripple Labs Inc., Bradley Garlinghouse, and Christian A. Larsen (collectively "Defendants") to respectfully request that the Court enter an order removing from the case file two exhibits, ECF Nos. 141-1 and ECF 141-2, that Defendants previously filed under seal in connection with their letter dated April 28, 2021 (ECF No. 141). After we filed these two exhibits, the SEC asserted that they were privileged and had been inadvertently produced, asking that Defendants destroy all copies of the exhibits pursuant to the Paragraph 30 of the Protective Order in this case (ECF No. 53). We accordingly make this request to avoid any noncompliance with our obligations under the Protective Order.

To be clear, Defendants do not agree with the SEC's assertion of privilege, which is baseless, and by making this request we are not conceding the validity of that assertion. Moreover, we note that Defendants requested last week that the SEC produce redacted versions of these documents as replacements to be filed with the Court, but the SEC has thus far failed to do so, without explanation.

Respectfully Submitted,

/s/ Martin Flumenbaum

Martin Flumenbaum

Counsel for Defendant Christian A. Larsen

cc: All counsel (via ECF)